

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

*In the Matter of:*

Hailesboro Post Office  
Hailesboro, New York

Docket No. A2011-72

UNITED STATES POSTAL SERVICE  
COMMENTS REGARDING APPEAL  
(November 7, 2011)

On September 13, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked September 7, 2011, from Natalie J. Spilman (Petitioner) objecting to the discontinuance of the Post Office at Hailesboro, New York. On September 14, 2011, the Commission issued a Form 56, Notice of Filing under 39 U.S.C. § 404(d). On September 15, 2011, the Commission issued Order No. 856, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 856, the administrative record was filed with the Commission on September 28, 2011.<sup>1</sup> The Petitioner filed a Participant Statement on October 18, 2011. The following is the Postal Service's answering brief in support of its decision to discontinue the Hailesboro Post Office.

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<sup>1</sup> The Petitioner states that there are discrepancies between some letters contained in the Administrative Record on file at the Hailesboro Post Office versus the Administrative Record filed with the Commission. In the Change Suspension Discontinuance Center (CSDC) system, some fields update automatically such as the date, name of the Post Office Operations Manager and location; hence, there are some differences between the version available at the Post Office and the version filed with the Commission. All of the customers received a response letter, but when the Post Office Coordinator went to retrieve an electronic copy of the letter sent to the customers from the CSDC system for purposes of uploading the Administrative Record with the Commission versus making photocopies of the original and then scanning the copies, the system automatically updated some of the fields such as the date. The content in the letters remained the same, and the letters in the Administrative Record represent the letters that were actually sent to the addressees. The Postal Service regrets any confusion that this technical error may have caused, but submits that it does not have any substantive implications for this appeal.

The appeal and Participant Statement received by the Commission generally raise three main issues: (1) the effect on postal services, (2) the impact upon the Hailesboro community, and (3) the economic savings expected to result from discontinuing the Hailesboro Post Office. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,<sup>2</sup> the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Hailesboro Post Office should be affirmed.

### **Background**

The Final Determination To Close the Hailesboro, NY Post Office and Continue to Provide Service by Rural Route Service, as well as the administrative record, indicate that the Hailesboro Post Office provides EAS-11 level service to 133 Post Office Box customers and no other delivery customers.<sup>3</sup> The Postmaster of the Hailesboro Post Office retired on June 29, 2010. A temporary officer-in-charge (OIC) was installed to operate the office.<sup>4</sup> The Hailesboro Post Office also had a noncareer postmaster relief (PMR) working in the office. Upon implementation of the Final Determination, the PMR

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<sup>2</sup> See 39 U.S.C. 404(d)(2)(A).

<sup>3</sup> FD at 2; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet ("Fact Sheet"), at 1. In these comments, specific items in the administrative record are referred to as "Item \_\_\_\_."

<sup>4</sup> The Petitioner states that the OIC is a Postmaster who receives a Postmaster salary, and therefore, the Hailesboro Post Office should not be studied for discontinuance. Docket No. A2011-72, Petitioner Statement from Natalie J. Spilman, October 18, 2011, at 3. In reality, however, the Postmaster position in Hailesboro is vacant. While the OIC detailed to Hailesboro is a Postmaster of her previous office, she is not filling the position permanently.

may be separated from the Postal Service if another placement is not available. The OIC will return to her home Post Office or afforded another OIC opportunity.<sup>5</sup>

The average number of daily retail window transactions at the Hailesboro Post Office is 76.<sup>6</sup> Revenue has generally been low: \$60,635.00 in FY 2008 (158 revenue units); \$67,792.00 in FY 2009 (177 revenue units); and \$63,163.00 in FY 2010 (165 revenue units).<sup>7</sup> The Hailesboro Post Office has no meter or permit customers.<sup>8</sup> Upon implementation of the final determination, delivery and retail services will be provided by rural route delivery administered by the Gouverneur Post Office, an EAS-18 level office located 2.5 miles away, which has 74 available Post Office Boxes.<sup>9</sup> This service will continue upon implementation of the Final Determination.<sup>10</sup>

The Postal Service followed the proper procedures that led to the posting of the Final Determination. Issues raised by the customers of the Hailesboro Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. Questionnaires were distributed to delivery customers of the Hailesboro Post Office. Questionnaires were also available over the counter for retail customers at the Hailesboro Post Office.<sup>11</sup> A letter from the Manager of Post Office Operations (Albany, NY) was also made available

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<sup>5</sup> FD at 12; Item No. 41, Proposal to Close the Hailesboro, NY Post Office and Continue to Provide Service by Rural Route Service ("Proposal"), at 13.

<sup>6</sup> FD at 2; Proposal at 2.

<sup>7</sup> FD at 2; Fact Sheet at 1; Proposal at 2.

<sup>8</sup> FD at 2; Fact Sheet at 1; Proposal at 2.

<sup>9</sup> FD at 2; Fact Sheet at 1; Proposal at 2.

<sup>10</sup> FD at 2.

<sup>11</sup> FD at 2; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Hailesboro Post Office, at 1.

to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Hailesboro Post Office was warranted, and that effective and regular service could be provided through rural route delivery and retail services available at the Gouverneur Post Office. The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of a possible change involving rural route delivery.<sup>12</sup> The returned customer questionnaires appear in the administrative record in Item No. 22.

In addition, representatives from the Postal Service were available at the Hailesboro Post Office lobby for a community meeting on April 28, 2011, to answer questions and provide information to customers.<sup>13</sup> The Town of Fowler Supervisor contacted the Postal Service, Albany District office, to invite the District Manager to a town-sponsored community meeting, the apparent object of which was to give citizens and customers an additional opportunity to ask questions, voice concerns, and submit responses to the proposal. Although a representative from the Postal Service did not

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<sup>12</sup> Item No. 21, Letter to Customer, at 1.

<sup>13</sup> FD at 2; Item No. 21, Letter to Customer, at 1; Item No. 24, Community Meeting Roster; Item No. 25, Community Meeting Analysis; Proposal at 1. Some customers questioned why the community meeting was held during the day when not everyone could attend and why not all of the Town Council members were contacted. FD at 5 and 9. Handbook PO-101, *Postal Service-Operated Retail Facilities Discontinuance Guide*, Sections 241 and 251, require that a community meeting be held at a time that encourages customer participation and that questionnaires be mailed to all PO Box and carrier delivery customers in the ZIP Code area of the facility under study. The Postal Service recognizes that the time of the community meeting will not be convenient for every citizen of Hailesboro. FD at 5. However, since this was an office with no street delivery, the community meeting was held in an open-house-style format to enable customers to have one-on-one discussions while picking up their Post Office Box mail. It should be noted that almost half of the Post Office Box holders are senior citizens for whom a community meeting during the day, when such citizens may be running errands or visiting in town, is likely more convenient than one later in the evening. *Id.* and Petitioner's Statement from Natalie J. Spilman, October 18, 2011, at 5. Further, a letter was mailed to all Post Office Box holders as there is no street delivery emanating from the Hailesboro Post Office.

attend the town-sponsored community meeting, customers were provided an opportunity to voice their concerns using the questionnaire or by calling the phone number on the meeting notice. Additionally, the Town of Fowler Supervisor was offered the opportunity to meet at the Albany District office along with other local officials.

Customers received formal notice of the Proposal and Final Determination through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Hailesboro Post Office and the Gouverneur Post Office from May 11, 2011, to July 12, 2011.<sup>14</sup> The Final Determination was posted at the Hailesboro Post Office and the Gouverneur Post Office starting on August 9, 2011, as confirmed by the round-dated Final Determination cover sheets that appear in the administrative record.

In light of the postmaster vacancy, minimal workload, low revenue, the variety of delivery and retail options (including the convenience of rural delivery and retail service), the projected population decline in the area, minimal impact upon the community, and the expected financial savings, the Postal Service issued the Final Determination.<sup>15</sup> Regular and effective postal services will continue to be provided to the Hailesboro community in a cost-effective manner upon implementation of the final determination.<sup>16</sup>

The issues raised by the Petitioner are addressed in the following paragraphs.

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<sup>14</sup> FD at 2; Proposal at 1, 8.

<sup>15</sup> See notes 3 and 4 and accompanying text; FD at 2-9, 10-12; Proposal at 2, 4-8; Item No. 16, Community Survey Sheet, at 3; Item No. 17, Alternate Service Options/Cost Analysis; Item No. 18, Fact Sheet, at 1.

<sup>16</sup> FD at 2.

### **Effect on Postal Services**

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Hailesboro Post Office on postal services provided to Hailesboro customers. The closing is premised upon providing regular and effective postal services to Hailesboro customers.

The Petitioner, in her letter of appeal and Participant Statement, alludes to the issue of the effect on postal services of the Hailesboro Post Office's closing, claiming that closure of the Hailesboro Post Office will result in a hardship and financial burden to local residents and customers. These concerns were considered by the Postal Service.

The Hailesboro Post Office has minimal workload.<sup>17</sup> The Postal Service determines postmaster level and Post Office service hours by analyzing the workload of a Post Office. The Hailesboro Post Office serves 133 Post Office Box and no general delivery customers.<sup>18</sup> The Hailesboro Post Office has an average of 76 daily retail window transactions.<sup>19</sup> Upon the implementation of the Final Determination, delivery and retail services will be provided by rural route delivery emanating from the Gouverneur Post Office. The window service hours of the Gouverneur Post Office are

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<sup>17</sup> FD at 2; Proposal at 2. The Petitioner alleges that the Postal Service's workload calculations fail to account for the actual amount of time that transactions may take, and that they are based on a time of year that has less-than-peak workload. Participant Statement at 2-3. However, the workload calculation worksheet, which was filled out by the OIC based on actual transactions, already accounts for variation in the processing time of different transactions.

<sup>18</sup> FD at 2; Proposal at 2; Item No. 9, Worksheet for Calculating Workload Service Credit.

<sup>19</sup> FD at 2; Proposal at 2; Item No. 10, Window Transaction Survey.

from 9 a.m. to 5 p.m., Monday through Friday, and 9 a.m. to 12 noon on Saturday, with 74 Post Office Boxes available.<sup>20</sup>

The effect of the closing of the Hailesboro Post Office on the availability of postal services to Hailesboro residents was considered extensively by the Postal Service.<sup>21</sup> Upon the implementation of the Final Determination, services provided at the Post Office, such as the sale of stamps, envelopes, postal cards, and money orders, will also be available from the carrier.<sup>22</sup> For carrier pick up of packages, customers can contact the Gouverneur Post Office to let the carrier know that a package is available for pick up.<sup>23</sup> The carrier can deviate from the line of travel in order to receive packages.<sup>24</sup> The rural carrier also can accept letters, flats or packages for mailing, estimating the cost and providing change or a bill for the amount over the estimate on the following delivery day.<sup>25</sup> The same arrangements can be made for quarterly mailings to the military overseas.<sup>26</sup>

With regard to the concern about obtaining accountable mail and large parcels, the carrier will attempt deliver to the customer's residence if the customer lives less than one-half mile from the line of travel.<sup>27</sup> If the customer lives over one-half mile away or is not home when delivery is attempted, a notice will be left in the mailbox.<sup>28</sup> Large parcels will be left outside the mailbox or at a location designated by the customer, or a

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<sup>20</sup> FD at 2; Proposal at 2; Fact Sheet at 1; Item No. 4; Highway Map with Community Highlighted, at 1.

<sup>21</sup> FD at 2-12; Proposal at 2-13.

<sup>22</sup> FD at 6; Item No. 41, Proposal, at 4; Item No. 21, Notice to Customers, at 4.

<sup>23</sup> FD at 3; Proposal at 5.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> FD at 6; Proposal at 8.

<sup>28</sup> *Id.*

notice will be left in the mailbox.<sup>29</sup> Attempted delivery items will be taken back to the Post Office.<sup>30</sup> Customers may pick up the Item at the Post Office or request redelivery online at usps.com or by calling 1-800-ASK-USPS.<sup>31</sup>

The Postal Service further explained that carrier service also is beneficial to many senior citizens and those who face special challenges because they do not have to travel to the Post Office for service.<sup>32</sup> Customers are not required to travel to another post office to receive mail or obtain retail services.<sup>33</sup> These services will be provided by the carrier to a roadside mailbox located close to customers' residences.<sup>34</sup> In hardship cases, delivery can be made to the home of a customer if a request for a change in delivery method is submitted in writing to the Gouverneur Postmaster.<sup>35</sup>

There was some concern regarding the time of day the carrier will deliver mail to customers' roadside boxes.<sup>36</sup> A customer's location on a carrier's line of travel determines the time of day mail is delivered.<sup>37</sup> Naturally, this precludes providing early delivery of mail to every customer.<sup>38</sup> The Postal Service explained, however, that it does carefully consider the volume of mail for each route so that the carrier can deliver the greatest amount of mail at the earliest possible hour, thereby balancing the goal to

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<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

<sup>32</sup> FD at 5 and 7-8.

<sup>33</sup> *Id.* and Proposal at 3-4, and 9.

<sup>34</sup> *Id.* and Proposal at 3-4 and 9.

<sup>35</sup> *Id.* and Proposal at 3-4.

<sup>36</sup> FD at 8; Proposal at 4.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*



deliver as much mail as possible as early as possible with the need to minimize the travel distance a route must cover.<sup>39</sup>

Customers opting for carrier service will not have to pay P.O. Box service fees.<sup>40</sup> However, the costs related to mailbox installation, as a result of carrier service, was an issue raised by the Hailesboro community.<sup>41</sup> Customers are only required to erect a mailbox if they would like carrier service.<sup>42</sup> They are responsible for mailbox installation and maintenance.<sup>43</sup> Mailboxes must be placed so that they may be safely and conveniently served by the carrier and should conform to state laws and highway regulations.<sup>44</sup> *Id.*

In addition to carrier service, customers may opt for Post Office Box service at the nearby Gouverneur Post Office. There are 74 Post Office Boxes available.<sup>45</sup> The Postal Service explained that if the number of P.O. Boxes at the Gouverneur Post Office does not meet the demand of Hailesboro customers, the Postal Service can install swivel units for additional P.O. Box access.<sup>46</sup> Additionally, the Postal Service has offered to consider the option of centralized delivery within the Hailesboro community. This would offer locked boxes for security and 24 hours access if located outdoors.<sup>47</sup>

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<sup>39</sup> *Id.*

<sup>40</sup> FD at 10; Proposal at 11.

<sup>41</sup> FD at 5; Proposal, at 5.

<sup>42</sup> FD at 9; Proposal at 9.

<sup>43</sup> FD at 5; Proposal at 5.

<sup>44</sup> *Id.*

<sup>45</sup> FD at 2; Proposal at 2.

<sup>46</sup> FD at 3.

<sup>47</sup> *Id.*; Proposal at 5; Item No. 15, Post Office Survey Sheet, at 2.

Some customers expressed concern on how P.O. Boxes, which they have held for many years, will be affected by a possible discontinuance.<sup>48</sup> Customers who retain their P.O. Box or currently have street delivery will not be required to change their address.<sup>49</sup> Customers who elect to close their P.O. Boxes and begin street delivery or those who elect to initiate post office box service at another location, other than Gouverneur, would be required to change their address.<sup>50</sup>

Petitioner and customers raised the issue of mail security, including leaving money for transactions in the mailbox.<sup>51</sup> The Postal Service researched this risk with the Postal Inspection Service and found that there have been no reports of vandalism in the area.<sup>52</sup> The Postal Service also queried the New York State Police, Gouverneur Office, and was advised that the request was too broad to process; however, to the knowledge of one local law enforcement official, there had been no recent reports of mail theft.<sup>53</sup> Customers were advised that they can put a lock on their mail box as long as the slot is large enough to accommodate their normal mail volume.<sup>54</sup>

Thus, the Postal Service has properly concluded that all Hailesboro customers will continue to receive regular and effective service via rural route delivery and the nearby Gouverneur Post Office.

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<sup>48</sup> FD at 2; Proposal, at 4.

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> FD at 7; Proposal, at 4.

<sup>52</sup> Item No. 14, Inspection Service/local law enforcement vandalism report; FD at 5 and 7; Proposal, at 4.

<sup>53</sup> Item No. 14a, Inspection Service/local law enforcement vandalism report;

<sup>54</sup> FD at 7; Proposal at 4.

### **Effect Upon the Hailesboro Community**

The Postal Service is obligated to consider the effect of its decision to close the Hailesboro Post Office upon the Hailesboro community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Hailesboro is an unincorporated rural community located in Saint Lawrence County. The State Police provides police protection, with fire protection provided by the Gouverneur Volunteer Fire Department. The community is administered politically by the Town of Fowler.<sup>55</sup> The questionnaires completed by Hailesboro customers indicate that, in general, the retirees, self-employed persons, commuters, and others who reside in Hailesboro may travel elsewhere for other supplies and services.<sup>56</sup>

The Petitioner's letter of appeal raises the issue of the effect of the closing of the Hailesboro Post Office upon the Hailesboro community. This issue was extensively considered by the Postal Service, as reflected in the administrative record.<sup>57</sup> The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name.<sup>58</sup> The record makes clear that the Postal Service is

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<sup>55</sup> FD at 10; Proposal at 7; Item No. 16, Community Survey Sheet, at 1.

<sup>56</sup> FD at 10; Proposal at 7; *see generally* Item No. 22, Returned Customer Questionnaires and Postal Service Response Letters.

<sup>57</sup> FD at 10-11; Proposal at 7.

<sup>58</sup> FD at 10-11; Proposal at 3.

addressing this concern through preservation of the community identity by continuing the use of the Hailesboro name and ZIP Code in addresses.<sup>59</sup>

Communities generally require regular and effective postal services and these will continue to be provided to the Hailesboro community. The Postal Service noted that residents may continue to meet informally, socialize, and share information at the other businesses, churches and residences in town.<sup>60</sup> The questionnaires completed by Hailesboro customers indicate that, in general, they may travel to nearby communities for other supplies and services.<sup>61</sup>

In addition, the Postal Service has concluded that nonpostal services, and the information center typically provided by the Hailesboro Post Office, can be provided by the nearby Gouverneur Post Office.<sup>62</sup> Government forms usually provided by the Post Office are also available by contacting local government agencies.<sup>63</sup>

Petitioner notes that the Proposal and the Final Determination lists "businesses and organizations" as none. While the record does not speak to this point, it is unclear what the source of a possible discrepancy would be. However, of the 17 "businesses" that Petitioner purports exist in the Hailesboro delivery ZIP Code, some of them are locations, not necessarily places that receive mail, such as a baseball field, basketball court, and cemetery. Others are primarily residential delivery locations, such as senior

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<sup>59</sup> FD at 10-11; Proposal at 3, 7.

<sup>60</sup> FD at 10-11; Proposal at 7.

<sup>61</sup> See generally FD at 6; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 1-214.

<sup>62</sup> FD at 10-11; Proposal at 11.

<sup>63</sup> FD at 10; Proposal at 7.

citizens' apartment housing; and still others are located in Gouverneur, such as the Gouverneur Country Club golf course.

Customers expressed a concern that the loss of the Post Office would have a detrimental effect on the business community. There is no indication that the Hailesboro business community will be adversely affected. Businesses generally require regular and effective postal services and these will continue to be provided to the Hailesboro business community. Questionnaire responses also indicate that customers will continue to use local businesses if the Post Office is discontinued.<sup>64</sup>

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Hailesboro Post Office on the community served by the Hailesboro Post Office.

### **Economic Savings**

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that extending rural route carrier service would cost the Postal Service substantially less than maintaining the Hailesboro Post Office and would still provide regular and effective service.<sup>65</sup> The estimated annual savings associated with discontinuing the Hailesboro Post Office are \$35,448.00.<sup>66</sup>

The Petitioner's letters of appeal suggests that the Hailesboro Post Office is profitable and therefore should be continued. However, postal regulations in the

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<sup>64</sup> FD at 11, Proposal at 12.

<sup>65</sup> FD at 5, 11; Proposal at 8; Item No. 20, Letter to Customer, at 1.

<sup>66</sup> FD at 11-12; Proposal at 8.

Handbook PO-101 do not consider the profitability of an office as a factor triggering or justifying the outcome of a discontinuance study. Rather, the Postal Service considers numerous factors, including workload, revenue trends, usage patterns, and alternate access. In this case, given the proximity of another Post Office and the provision of service through rural route, the Postal Service has determined that it can still provide regular and effective service to the community.

The Petitioner also questions the annual cost of replacement service figure of \$15,611.03 on grounds that the figure is based on the Postal Service's guess that it will be delivering to 106 new rural route boxes if the Hailesboro Post Office is closed.<sup>67</sup> The Postal Service's estimate is based on the fact that, in its experience, more residents typically choose home delivery over Post Office Box service. Therefore, the estimate is reasonable.

Petitioners in this appeal question the consistency of this proposal with statutory authority in Title 39 providing that no small Post Office may be closed solely for operating at a deficit. Here, however, a variety of factors inform the decision to discontinue the Hailesboro Post Office, including a postmaster vacancy; minimal workload; low office revenue;<sup>68</sup> the variety of delivery and retail options (including the convenience of rural carrier delivery and retail service);<sup>69</sup> minimal impact upon the community; and the expected financial savings.<sup>70</sup> Pursuant to 39 U.S.C. § 404(d)(2)(A)(iii), the Postal Service in determining whether to close a Post Office must

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<sup>67</sup> A2011-72, Petitioner Statement from Natalie J. Spilman, October 18, 2011 at 6.

<sup>68</sup> See note 3 and accompanying text.

<sup>69</sup> FD at 2, 47; Item No. 41, Proposal, at 2, 16-19.

<sup>70</sup> FD at 16-19; Item No. 42, Post Office Fact Sheet, at 1; Item No. 41 at 17-19.

consider whether such closing is consistent with the policy that the Postal Service provide “a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining.” In this case, the Postal Service analyzed, among other factors, the Hailesboro Post Office’s workload and revenue. The consideration of an office’s workload and revenue is not inconsistent with the policies of Title 39, however, because analysis of workload and revenue does not imply that a small Post Office is operating at a deficit. The Postal Service then analyzed whether a maximum degree of effective and regular postal services to the area and community could be provided with rural delivery service in the absence of the Post Office, and the answer was affirmative.

Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv).<sup>71</sup>

### **Effect on Employees**

As documented in the record, the impact on postal employees is minimal. The postmaster retired on June 29, 2010. A temporary officer-in-charge (OIC) was installed to operate the office.<sup>72</sup> The Hailesboro Post Office also had a noncareer postmaster relief (PMR) working in the office. Upon implementation of the Final Determination, the PMR may be separated from the Postal Service if another placement is not available.

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<sup>71</sup> FD at 3-5, 11; Proposal at 8.

<sup>72</sup> FD at 2 and 12; Proposal at 13.

The OIC will return to her home Post Office or afforded another OIC opportunity.<sup>73</sup> The record shows that no other employee would be affected by this closing.<sup>74</sup> Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Hailesboro Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

### **Conclusion**

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Hailesboro Post Office on the provision of postal services and on the Hailesboro community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Hailesboro customers. The Postal Service submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). Accordingly, the Postal Service respectfully requests that the determination to close the Hailesboro Post Office be affirmed.

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<sup>73</sup> FD at 12; Proposal at 13.

<sup>74</sup> FD at 11-12; Proposal at 8; Item No. 15, Post Office Survey Sheet, at 1.



Respectfully submitted,

UNITED STATES POSTAL SERVICE

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November 7, 2011